

SANDLER REIFF

SANDLER REIFF LAMB
ROSENSTEIN & BIRKENSTOCK, P.C.



Digitally
signed by
Donna Rawls
Date:
2016.10.27
16:09:31
-04'00'

1025 Vermont Ave NW, Suite 300
Washington, DC 20005
www.sandlerreiff.com
T: 202-479-1111
F: 202-479-1115

October 27, 2016

Via E-Mail

Jeff S. Jordan, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington D.C. 20463

Re: MUR 7107

Dear Mr. Jordan:

I serve as counsel for Progress United PAC and Joseph Aiken, in his official capacity as Treasurer. A designation of counsel is attached to this response. I write to respond to a complaint filed by Richard L. Defeo. Please note that, although the initial complaint was mailed to respondent on July 20, 2016, the complaint was just discovered in the PAC's mailbox this week.

In his complaint, Mr. Defeo alleges that Progress United PAC has failed to include disclaimers on communications that Mr. Defeo asserts were made by Progress United PAC. In addition, Mr. Defeo alleges that the PAC failed to file 48 Hour reports for Independent Expenditures.

Notwithstanding Mr. Defeo's incorrect statements of law and fact, to date, Progress United PAC has not disseminated any communications in connection with any election. As its reports through September 30, 2016 disclose, Progress United PAC had not yet engaged in any meaningful activity through the end of September.

The activities that Mr. Defeo refers to in his complaint were, in fact, disseminated by Progress United, and not by Progress United PAC. Progress United is a social welfare organization organized under section 501(c)(4) of the Internal Revenue Service that was formed

www.1000000.com

Respectfully submitted,


Neil Reiff

Neil Reiff
Counsel for Progress United PAC and Joe
Aiken, in his official capacity as Treasurer



FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

FAX 202-219-3923

MUR # 7107

Name of Counsel: Neil Reiff

Firm: Sandler, Reiff, Lamb, Rosenstein & Birkenstock, P.C.

Address: 1025 Vermont Ave, NW Suite 300
Washington, D.C. 20005

Telephone: (202) 479-1111 Fax: (202) 479-1115

E-mail: reiff@sandlerreiff.com

The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/25/16
Date

[Signature]
Signature (Respondent/Agent)

Treasurer
Title

RESPONDENT: Progress United PAC and Joseph Aiken, as Treasurer
(Committee Name/ Company Name/Individual Named in Notification Letter)

Mailing Address: 2308 Mt. Vernon Avenue, Suite 222
(Please Print) Alexandria, VA 22301

Telephone (H): _____ (W): 703-591-1040

E-mail: jaiken@aikencopc.com

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.

EXHIBIT A

17044442113810

Application Summary

Page 1 of 1

Application Detail

License Type:	501c4
Application Number:	30158
Application:	Form 8976, Notice of Intent to Operate Under Section 501(c)(4), OMB No.1545-2268
Application Date:	08/05/2016 (mm/dd/yyyy)

Organization Detail

Organization Name:	Progress United
Tax Number:	*****

Addresses

Address: **3975 University Drive**
Suite 200
FAIRFAX, VA
22030
US

Extension:

Organization Information

Date of Organization	05/02/2016 (mm/dd/yyyy)
State of Organization	Virginia
Country of Organization	United States
Filing Year Month	12-December
Organization Statement of Purpose	Social Welfare / Civic League

Fees

Form 8976, Notice of Intent to Operate Under Section 501(c)(4)	\$50.00
Total Amount Due:	\$50.00

Attestation

I attest that the information provided is correct and that I have the authority to submit this information.

CONFIDENTIAL